REMARKS

The claims have been amended to remove a limitation that is not necessary in the broadest claims and for clarity. The removed limitation is specifically covered by new claims 14 and 15. Claims 16 -19 have been added to define applicant's contribution to the art slightly different from the way it is defined in the previously submitted claims. The basis for new claims 16 -19 is found in connection with figure 1, on pages 5-7 of the substitute specification, particularly on page 6, line 4-page 7, line 3. To expedite prosecution, redundant claims 9 and 10 are cancelled.

Apparatus claims 1-3 are rejected under 35 USC 103(a) as being obvious as a result of the admitted prior art (AAPA) in view of Redlich et al., US Patent Publication 2002/0154174 and Karasawa et al., US Patent Publication 2003/0117532 which is discussed in the application as filed. The office action admits the admitted prior art does not disclose a server connected to a projector via a communication network, but says such a feature is disclosed by Karasawa et al. and it would have been obvious to include such a feature in the admitted prior art to provide enhanced capability of remote access to a projector and better operation, as disclose by Karasawa et al. in paragraph 0011. The office action also admits the admitted prior art does not disclose a terminal connected via a network and network access software to a web site hosted by a server, to load a file including remote control projection software. The office action relies on paragraph 0014 of Redlich et al. to disclose this feature and says it would have been obvious to have modified the examiner's proposed combination of the admitted prior art and Karasawa et al. to include this feature because the feature would provide enhanced capability of providing three dimensional surfaces and three-dimensional virtual environment depicting an actual place in an actual entity, as allegedly disclosed in paragraph 0033 of Redlich et al..

Independent method claim 4 is rejected under 35 USC 103(a) as being obvious as a result of the admitted prior art in view of Redlich et al.. The office action alleges

the admitted prior art discloses all features of claim 4 except for (1) executing network access software on a terminal connected to an Internet communication network, (2) entering a determined URL address into the network access software to access a web site hosted by a server via the Internet, and (3) downloading a web page from the web site in the network access software with which an .ocx extension file is linked, wherein the software includes remote control projection software offering an interface enabling the network access software and the scripts of the web page to execute and control the extension file. The office action alleges Redlich et al. discloses features (1)-(3) and that it would have been obvious to include the features Redlich et al. discloses in the admitted prior art because these features would provide the admitted prior art with enhanced capability, as Redlich et al. discloses in paragraph 0033.

Applicant cannot agree with the rejection of either independent claim 1 or 4 and therefore traverses these rejections. None of the prior art references applied against independent claims 1 and 4 is concerned with the same problem which applicant confronted, that is, controlling projection of image data at a terminal that is connected to a projector by a communication network or link without modifying the terminal containing the data to be projected (see § [0009] and [0013] of the published application). For example, the subject matter of claims 1 and 4 relates to a video-projector for projecting, onto a screen of a conference room, video data displayed on the screen of a terminal, such as a lap top computer, can use the terminal operating system without installing the remote control software 16 (illustrated in the prior art of figure 2) on the terminal as in the prior art. Installing such software is a lengthy, cumbersome, costly operation requiring the possession of various different software programs 16 of the admitted prior art of Figure 2. The number of such installed programs is equal to the number of terminals on which the software is to be installed.

Redlich is far removed from the subject matter of claims 1 and 4. Redlich discloses a method and system for providing 3-D services and 3-D visual directories in a photorealistic, 3-D virtual environment depicting a real-life entity. The aim pursued by Redlich is to fill the need for photorealistic, 3-D virtual environments to depict what a user may actually see and/or experience and to allow greater mapping, visual browsing,

historical, educational, entertainment, and commercial opportunities than are currently available. Hence, the subject matter and the aim pursued by Redlich are entirely different from those of claims 1 and 4.

The office action alleges paragraph 0014 of Redlich discloses a "client uses a web browser to communication with server via internet using a web browser to access a determined website hosted by the server, server store files, one of these files may be ActiveX, this will be downloaded to the client from the server through the specific website when needed. (sic)" The office action states it would have been obvious to one skilled in the art at the time the invention was made to improve on the method described in AAPA by implementing network access software to download an ActiveX control file, as disclosed by Redlich, because such a modification would provide the AAPA with enhanced capability of providing 3-D services and 3-D virtual environment depicting an actual place and an actual entity, by referring to paragraph 0033 of Redlich.

One difference between Redlich and the present application concerns the difference between the words "download" and "load" in the technology to which the present application is concerned, and generally in computer science. A download is an operation involving transfer of some files from a remote computer to a local computer, through a network. In contrast, a load is a set of tasks to be executed by a computer at a given time. Hence, a download modifies a terminal, whereas a load does not. Moreover, there is no point in downloading an execution file installing the execution file.

In Redlich, at least one download of an execution file (ActiveX) to be installed is needed to make it possible for the terminal to provide such weighty 3-D services and 3-D virtual environment. In the invention of claims 1 and 4, one load is needed to make it possible to remotely control projection without having to install remote control software on the terminal.

The words 'when needed' in Redlich do not mean that at least one download is optional in order to make it possible for the terminal to provide 3-D services and 3-D virtual environment. Instead, these words mean that more than the application(s) downloaded and installed in the terminal is required with respect to the plurality of 3-D services offered by Redlich (see paragraphs 0053-0057).

Redlich teaches away from a solution of the problem applicant solves. Consequently one of ordinary skill in the art would not have modified the AAPA as a result of Redlich to include the requirement of claim 1 for a terminal connected via a network and network access software to a web site hosted by a server, to load a file including remote control projection software. Similarly, one of ordinary skill in the art would not have modified the AAPA as a result of Redlich to include the requirement of claim 4 to (1) execute network access software on a terminal connected to an Internet communication network, (2) enter a determined URL address into the network access software to access a web site hosted by a server via the Internet, and (3) download a web page from the web site in the network access software with which a file is linked, wherein the software includes remote control projection software offering an interface enabling the network access software and the scripts of the web page to execute and control the extension file.

The office action states claim 4 is rejected under 35 USC 103(a) as being unpatentable over AAPA in view of Redlich et al. According to the office action, AAPA, as set forth in paragraph 0003 and Fig. 2 of the application as filed, and Redlich make obvious a method of video-projecting video data displayed on a screen of a terminal, the method comprising:

- sending video data displayed on the screen of the terminal to the communication network,
- receiving video data by video software adapted to the video projector, which is installed on the server, and transmitting data to the video projector.

As discussed above, the office action admits the AAPA does not disclose explicitly the following steps of claim 4:

- executing network access software on the terminal, the terminal is connected to an internet communication network,
- entering a determined URL address into the network access software to access a web site hosted by a server via the internet communication network,
- downloading a web page from said web site in the network access software

of the terminal, with which an .ocx extension file is linked, the software comprising remote control projection software offering an interface (ActiveX) enabling the network access software and the scripts of the web page to execute and control the .ocx extension file.

The office action alleges Redlich discloses such features.

By referring to paragraph 0014, the office action states Redlich discloses that a "client uses a web browser to access a determined website hosted by the server" and "a client communicates with the server over the internet using a web browser to access a determined website hosted by the server."

In consequence, the applicant amends claim 4 by inserting the term 'wherein' after the features according to which the method of video-projecting comprises "executing network access software on the terminal, the terminal is connected to an internet communication network" and "entering a determined URL address into the network access software to access a web site hosted by a server via the internet communication network."

Then, by referring to paragraphs 0014 and 0050, the Examiner states Redlich discloses that the server stores files, one of these files may be ActiveX, this will be downloaded to the client from the server through the specific website when needed.

In consequence, the applicant amends claim 4 by changing the word 'downloading' to the word 'loading.' Such an amendment is supported by the specification of the present invention, more particularly by paragraph 0032 which discloses "the web page with which the .ocx extension file is linked is then loaded in the network access software." This amendment, in accordance with the above mentioned definitions of 'download' and 'load,' indicates "the .ocx extension file containing the remote control projection software is executed without the need for its installation on the terminal" (see paragraph 0037 of the present application).

The above arguments presented for claim 1 and paragraph 0043 of Redlich indicate the Redlich system explicitly requires downloads, and implicitly installations, of some executable programs or specific libraries on the client device to work.

Claim 4 is now modified and reads as follows:

"A method of video-projecting video data displayed on a screen of a terminal, the

method comprising:

executing network access software on the terminal the terminal is connected to an Internet communication network,

entering a determined URL address into the network access software to access a web site hosted by a server via the Internet communication network,

wherein the method further comprises:

loading a web page from said web site in the network access software of the terminal, with which a file is linked, the software comprising remote control projection software offering an interface (ActiveX) enabling the network access software and the scripts of the web page to execute and control the file.

sending video data displayed on the screen of the terminal to the communication network by executing the file with the network access software,

receiving video data by video software adapted to the video-projector, which is installed on the server, and transmitting data to the video-projector."

The terms "where the method further comprises" are added to more clearly indicate the "method of video-projecting video data displayed on a screen of a terminal comprises:

executing network access software on the terminal the terminal is connected to an Internet communication network,

entering a determined URL, address into the network access software to access a web site hosted by a server via the Internet communications network."

According to the above arguments, amended claim 4 is not made obvious by the admitted prior art and Redlich.

Because one of ordinary skill in the art would not have modified the AAPA as a result of Redlich, the rejection of claim 1 based on the AAPA, Redlich and Karasawa fails. In addition, one of ordinary skill in the art would not have modified the AAPA, or the combination of the AAPA and Redlich as a result of Karasawa. Moreover, nothing in Karasawa and/or Redlich suggests the combination of their respective disclosures with each other or the AAPA.

Karasawa et al. relates to controlling a projector by using a wireless mobile

terminal. Karasawa et al. and the present application both include a figure relating to the prior art having problems that each application desires to solve; namely Fig. 15 of Karasawa et al. and Fig. 2 of the present application. A comparison of these figures and the texts of the specifications referring to them, indicates applicant and Karasawa et al. are dealing with entirely different problems. It appears that the network shown in Fig. 15 of Karasawa et al. includes connections from a projector to a server, from the projector to a terminal and from the server to the terminal. In contrast, the network shown on Fig. 2 of the present application discloses a connection from the terminal to the server. In short, the architectures of each network differ one from each other. Hence, the starting point of Karasawa's application is not the same as the starting point of the present application.

Paragraph 0010 of Karasawa et al., indicates the aims pursued by this reference are:

- to enable a projector to be remotely controlled so the projector can be controlled by a person who is not sitting near the projector or a personal computer, and
- to enable projection data to be sent in both directions between a remote controller and a projector so that the image projected on the projector can be monitored on the remote control.

Neither of the aims pursued by Karasawa et al. is related to remotely controlling a projector without modifying a terminal containing the data to be projected. Thus, the aims pursued by Karasawa et al. are entirely different from the aim pursued by applicant.

Karasawa et al. discloses a projector control system and control method in which projector projection control and/or projection data sending/receiving or transfer control can allegedly be performed at a place remote from the projector, with better operability being achieved. This brought, for example by the claimed subject matter which is directed to a projector wireless control system comprising:

- a projector which includes a network module for communicating with another device, and projects projection data, and
- a mobile terminal which includes a projector control function for controlling operation of the projector, and is wirelessly connected to the projector,

allowing two-way communication with the projector through the network module."

According to the office action, AAPA discloses a "video-projection device comprising at least one terminal including video data to be projected, a server and a projector, the server being connected to the projector by hardwire connection," by referring to Fig. 2 (we read Fig. 1) of Karasawa's application.

In order to raise the previous cited objection of the Examiner, claim 1 of the present application has been modified by adding the term "wherein" after the term "video-projection device comprising at least one terminal including video data to be projected, a server and a projector, the server being connected to the projector by hardwire connection" in order to clearly include these features are in the claim.

The office action admits the AAPA does not explicitly disclose: the server being connected to the projector via a communication network. The office action states Karasawa, at paragraph 0013, discloses: a projector wireless control system, where the projector is wirelessly connected to a device (server).

The office action states it is obvious to improve the method described in AAPA by implementing a communication between the server and projector via a wireless network because it would provide the AAPA with enhanced capability of remote access to the projector providing better operationality, by referring to paragraph 0011 of Karasawa.

The Examiner is misinterpreting Karasawa by stating that the projector is wirelessly connected to a server. A correct reading of paragraph 0013 of Karasawa indicates a mobile terminal, and not a server, is wirelessly connected to the projector. Moreover, claim 1 requires the terminal, not the projector, to be connected to the server via a communication network. Claim 1 indicates the server and the projector are connected by a hardwire connection.

A comparison of Fig. 1 and claim 1 of Karasawa and the first part of claim 1 of the present application, reveals two substantial technical differences. First, in Karasawa, the network module is included in the projector, whereas, claim 1 indicates the network module is included in the server by saying "the terminal is connectable, via the network and network access software to a web site hosted by the server." Second, in Karasawa,

the network module is included in the projector for communicating with another device, namely the server. in claim 1 of the present application, the network module is included in the server for communicating with the terminal.

In view of the above arguments, it is clear the Karasawa's system does not have the same architecture as the video-projection apparatus of claim 1. Thus, one of ordinary skill in the art would not have modified the AAPA as a result of Karasawa to provide the requirement of claim 1 for a server connected to a projector via a communication network.

The office action erroneously states Karasawa discloses a terminal and a server being wireless connected and the use of video software to transmit data from the server received from the screen of the terminal to the projector.

First, as discussed previously, and contrary to the statement in the office action, in Karasawa, the terminal and the server are not wirelessly connected (see Figs. 1, 3, 4 and 5 and the discussion thereof in paragraphs 0067, 0068 and 0069, respectively. In the flow diagram of Figure 3, the video data to be projected are stored in the server. The terminal sends a file move control signal to the projector which sends the file move control signal to the server. Then, in response, the server sends the predetermined projection data to the projector, to enable the projector to project the projection data which were originally in the data server.

In the second flow diagram embodiment of Figure 4, the video data to be projected are stored in the projector. The terminal sends a file move control signal to the projector which sends the projection data which is projected or held by the projector to the server. Since the data server can store the projection data possessed by the projector, the projection data can be centrally stored.

In the third flow diagram embodiment of Figure 5, the video data are stored in the terminal. The projector imports and stores the projection data to make it possible for the projector to project the projection data by using a command of the terminal, and the server is used only optionally.

Hence, none of these embodiments supports the allegation in the office action that the reference discloses "the use of a video software to transmit the data from the server

received from the screen of the terminal to the projector."

Third, in Karasawa, the projector control application is included in a terminal which directly sends to the projector the file move control signal in the three flow diagram embodiments of Figures 3-5 (see claim 1 of Karasawa's application). This is exactly what the present application avoids doing.

In short, Karasawa is a perfect example of prior art including the deficiency to be resolved by the subject matter of claim 1, namely the requirement to separately install, on a terminal having data to be displayed, software for remotely controlling the projection. Consequently, one of ordinary skill in the art would not have modified the AAPA as a result of Karasawa to arrive at the subject matter of claim 1.

The dependent claims are allowable for the same reasons advanced for the claims upon which they depend. In addition, many of the dependent claims are improperly rejected.

In the rejection of claim 2, the office action incorrectly states Fig. 2 of Karasawa discloses a terminal and server communicating through network cards and respectively via a wireless network. This statement is wrong because the terminal and the projector, but not the server, are wirelessly connected. In addition, the terminal and server communicate only through the projector which is equipped with a network module.

As per claim 3, the office action incorrectly states Fig. 2 of Karasawa indicates the communication network between terminal and server 2 is a wireless network. The office action is wrong for the same reasons as per claim 2.

The rejection of claim 5 in the office action incorrectly states Redlich discloses the use of an ActiveX control file but admits the reference does not explicitly disclose:

"wherein the video data, before being sent to the server, is compressed by the file then, before being sent to the video-projector, is decompressed by the video-projector." However, the office action alleges this feature is disclosed by paragraphs 0023 and 0024 of Hsiao, US Publication 2003/0081561. Applicant does not agree because paragraph 0023 discloses a coding module for coding data and a User Datagram Protocol for dividing and packaging data in a plurality of packets and a first radio module for transmitting radio signals representing the packets of data. It appears

the Examiner mistakenly misconstrues 'to code' as 'to compress.' In computer science, coding data means transforming data according to a set of rules and conventions indicating a way of producing, emitting, receiving and processing signals representing data, whereas compressing data means transforming data according to a process which decreases the size of the data without losing significant information.

In Hsiao's application, data are divided into packets having a fixed predetermined size to make it possible to emit the packets regardless of their size. Claim 5 requires the data to be compressed, not divided into packets. The same comments apply mutatis mutandis for the decompressing process with respect to the coding process. Thus, the combination of Redlich and Hsiao does not suggest a method "wherein the video data, before being sent to the server, is compressed by the file then, before being sent to the video-projector, is decompressed by the video projector."

As per claim 7, the office action admits that Redlich and Hsiao do not disclose explicitly a method:

"wherein execution of the .ocx extension file is prompted by activating a button associated with the .ocx extension file execution function, and shown on the web page with which the .ocx extension file is linked."

The office action alleges this feature is disclosed by Parthasarathy, US Patent 6,802,061, and more particularly by column 9, lines 20-40. Parthasarathy discloses a control file which is used to determine the location of software components in one or more remote computers to enable download of the software components to a local computer. As mentioned above, the aim of the present application is incompatible with any kind of download to the terminal or local computer, equivalently. Parthasarathy adds no significant feature to the combination of Redlich and Hsiao which is opposite to the object of claim 7. The subject matter of claim 7 is thus not rendered obvious by the combination of the AAPA, Redlich, Hsiao, and Parthasarathy.

As per claim 12, the office action admits Redlich and Hsiao do not disclose explicitly:

"wherein execution of the .ocx extension file is prompted by activating a button associated with the .ocx extension file execution function, and shown on the web page

with which the .ocx extension file is linked."

However, according to the office action, this feature is disclosed by Parthasarathy. Parthasarathy discloses a control file which determines the location of software components in one or more remote computers to download to the local computer. As mentioned above, the aim of the present application is incompatible with any kind of download to the terminal or local computer, equivalently. Parthasarathy adds no significant feature to the combination of the AAPA, Redlich and Hsiao which is opposite to the object of the present application and more particularly to the object of claim 12.

As per claims 8 and 13, the office action admits the combination of AAPA, Redlich, Hsiao and Parthasarathy does not explicitly disclose:

"wherein stopping of the projection is prompted by activation of a button associated with the stop function of the .ocx extension file execution function and shown on the web page with which the .ocx extension file is linked."

However, according to the office action, this feature is disclosed by Karasawa at paragraphs 0031, 0063 and 0064. As mentioned above, Karasawa is a perfect example of prior art having a disadvantage the present application proposes to solve. In Karasawa's application, the control application software enables a terminal to stop or start projection since the control application software controls image projection and is installed on the terminal. Consequently Karasawa adds no significant feature to the combination of AAPA, Redlich, Hsiao and Parthasarathy which are opposite to the object of claim 8.

Allowance is in order.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 07-1337 and please credit any excess fees to such deposit account.

Respectfully submitted,

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